

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Lyonel Jean-Louis  
a/k/a Louis Lyonel Jean, Sr.  
a/k/a Lyonel Jean-Louis, Sr.

**Debtor 1**

CSMC 2018-RPL1 Trust

**Movant(s)**

v.

Lyonel Jean-Louis  
a/k/a Louis Lyonel Jean, Sr.  
a/k/a Lyonel Jean-Louis, Sr.  
Nicole Jean-Louis (Non-Filing Co-Debtor)

**Respondent(s)**

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
**Additional Respondent**

**Chapter 13**

**Case No.** 1:19-BK-03570-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 53

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Lyonel Jean-Louis, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Denied. Jack N. Zaharopoulos, Esquire is the Standing Chapter 13 Trustee appointed by the Court.
4. Admitted.
5. Admitted.
6. Admitted
7. Upon information and belief, the averment as stated in Paragraph 7 is admitted.
8. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
9. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
10. Paragraph 10 contains a conclusion of law to which no response is required.
11. Paragraph 11 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: June 8, 2021

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
PA ID No. 201207  
2132 Market Street  
Camp Hill, PA 17011  
(717) 975-9446  
pmurphy@dplglaw.com  
*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Tuesday, June 8, 2021, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)'**

**Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Rebecca Solarz, Esquire  
KML Law Group, PC  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
*Counsel for Movant(s)*

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Room 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire